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## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

| UNITED STATES OF AMERICA, | )                                     |
|---------------------------|---------------------------------------|
| Plaintiff,                | )<br>)<br>Case No.: 4:20-CR-00522-AGF |
| vs.                       | )                                     |
| DELVON JONES              | )                                     |
| Defendant.                | )                                     |

## **MOTION TO CONTINUE SENTENCING HEARING**

COMES NOW, Defendant, Delvon Jones, by his attorney, Martin Minnigerode, and hereby requests that this court continue the sentencing hearing set for July 19, 2021 at 11 a.m. In support thereof, the Defendant states as follows.

- Counsel for Defendant was appointed to represent the Defendant on July 15, 2021 after previous counsel was granted leave to withdraw after a potential conflict of interest was discovered.
- 2. Counsel for Defendant needs additional time to review the matter and speak with the defendant about the change of counsel.
- 3. Counsel has been advised that the U.S. Marshals Office will not be able to transport the Defendant from his place of confinement in Kentucky to St. Louis in time for the scheduled sentencing hearing.
- 4. After conferring with the clerk of this court and counsel for the government, it is requested that the matter be continued to July 27<sup>th</sup>, 28<sup>th</sup>, or 30<sup>th</sup> at 1 p.m. for a sentencing hearing.

WHERFORE, Defendant respectfully requests that the Court continue the sentencing hearing presently set for July 19<sup>th</sup> to July 27<sup>th</sup>, 28<sup>th</sup>, or 30<sup>th</sup> at 1 p.m.

Respectfully Submitted,

Martin Minnigerode, #47654MO

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Attorney for Defendant

## **CERTIFICATE OF SERVICE**

The undersigned certifies that on **July 15, 2021** this document was filed with the court via the CM/ECF system which will send notice to all parties of record.